

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*  
Plaintiffs,

v.

Civ. Action No.: 14-cv-00029-AB

National Football League and  
NFL Properties, LLC,  
successor-in-interest to  
NFL Properties, Inc.,  
Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**STIPULATION AND [PROPOSED] ORDER<sup>1</sup>**

This Stipulation and Agreement, dated July 10, 2019, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

---

<sup>1</sup> Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Player Dwight Hicks (ECF No. 6533);

WHEREAS, Dwight Hicks has since submitted a written request seeking to revoke his Opt Out request (*see* Exhibit 1 (Declaration of Orran L. Brown, Sr.));

WHEREAS, the Parties have agreed to accept the revocation request submitted by Dwight Hicks, subject to Court approval, because he submitted it before this Court ruled on threshold motion practice in the Opt Out litigation;

**AND NOW**, this 10th day of July 2019, it is hereby stipulated and agreed by the Parties that the revocation request submitted by Dwight Hicks is accepted, subject to Court approval, because he submitted it before this Court ruled on threshold motion practice in the Opt Out litigation.

**It is so STIPULATED AND AGREED,**

By: 

Date: July 10, 2019

Christopher Seeger  
**SEEGER WEISS LLP**  
55 Challenger Road, 6<sup>th</sup> Fl.  
Ridgefield Park, NJ 07660  
Phone: (973) 639-9100  
cseeger@seegerweiss.com

*Class Counsel*

By: 

Date: July 9, 2019

Brad S. Karp  
**PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Phone: (212) 373-3000  
bkarp@paulweiss.com

*Counsel for the NFL Parties*

It is so **ORDERED**, based on the above Stipulation and the accompanying Declaration of Orran L. Brown, Sr., that the revocation request submitted by Dwight Hicks is approved and the Claims Administrator is **DIRECTED** to post a revised list of Opt Outs forthwith excluding Dwight Hicks.

---

ANITA B. BRODY, J.

Copies **VIA ECF** on \_\_\_\_\_ to:

Copies **MAILED** on \_\_\_\_\_ to: